

# EXHIBIT Q

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN)  ECF Case
This document relates to:  <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN)  ECF Case

**DECLARATION OF GABRIEL ESPOSITO**

I, GABRIEL ESPOSITO, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present in New York City when the terrorist attacks of the World Trade Center Towers occurred. At the time of these horrific attacks, I was a firefighter with the New York City Fire Department. I was assigned to Engine 14 and I was recalled the morning of September 11, 2001, due to the emergency circumstances at the World Trade Center caused by what I later learned were terrorist attacks involving passenger jets.

4. I was present at the World Trade Center Towers on 9/11 and the two days following the collapse of the Towers. As I rushed to rescue survivors of these horrific terrorist attacks, I was struck by the falling building debris, which caused injuries to my ankle, hip, shoulder, and my

elbow. Further, I inhaled massive amounts of dust, chemicals, and building debris during my rescue efforts following the collapse of the World Trade Center Towers.

5. During the course of my experiences at Ground Zero on 9/11 and the days afterward, I witnessed atrocities, death, and destruction the likes of which most Americans have never encountered. The scene could only be compared to a war zone.

6. As a result of these terrorist attacks, I suffered the following specific physical injuries on September 11, 2001: a dislocated ankle, a dislocated hip, a shoulder sprain, and an injury to my elbow. Due to the large amounts of building debris, dust, and chemicals that I inhaled following the collapse of the World Trade Center Towers, I suffered and continue to suffer from GERD, chronic rhinosinusitis, and I have developed skin cancer.

7. I sought and continue to seek medical attention on a monthly basis for my injuries caused by these terrorist attacks. Attached as Exhibit B to this Declaration is a true and correct copy of my select relevant medical records related to the treatment that I received for my physical and emotional injuries following the September 11, 2001 terrorist attacks. Included with these records are documents from the World Trade Center Health Program which confirm my injuries and numerous health conditions related to the events of 9/11.

8. I previously pursued a claim (Claim Number VCF 0011056) through the September 11<sup>th</sup> Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 25th day of February 2021.

  
Declarant, Gabriel Esposito

**EXHIBITS  
FILED  
UNDER SEAL  
(ECF No.  
5716)**